

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

CHRISTIE ANDREWS,

Plaintiff,

v.

TRI STAR SPORTS AND
ENTERTAINMENT GROUP, INC.

Defendant.

Civil No. 3:21-cv-00526

Judge Eli J. Richardson

Magistrate Judge Jefferey S. Frensley

PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION FOR EXTENSION OF TIME

Plaintiff does not oppose Defendant's motion for extension. Attached is the e-mail exchange regarding the extension. Plaintiff asked for additional time in response to a letter Defendant sent Monday unilaterally setting a deadline for Wednesday. [Exhibit 1 & 2]. Plaintiff and her counsel have been working to align their schedules since Monday.¹ Plaintiff objects to Defendant's characterization of the status of the discovery. Plaintiff has responded to interrogatories and request for production and has steadily addressed any discovery disputes, including producing 234 pages of Plaintiff's confidential medical records and 46 pages of Plaintiff's subsequent employment and earnings information. Defendant makes many other assertions that are inaccurate and will be addressed in the joint statement of discovery disputes that Defendant sent at 4:14PM and is demanding be filed today. [Exhibit 3].

Respectfully submitted,



¹ Plaintiff is presently out-of-state related to a recent death. Like Defense counsel Plaintiff's counsel is traveling for Williamson County's school spring break.

Daniel Arciniegas
ARCINIEGAS LAW

CERTIFICATE OF SERVICE

I hereby certify that on Thursday, Friday, March 11, 2022, I electronically served the foregoing ***PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION FOR EXTENSION OF TIME*** via e-mail:

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Respectfully submitted,



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